

IN THE DISTRICT COURT OF THE UNITED STATES  
DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION

UNITED STATES OF AMERICA

v.

DA RON JEROME COLLINS

Crim. No. 7:23-00900-TMC

Government's Notice Pursuant to Fed. R.  
Crim. P 16(a)(1)(G)  
Concerning Expert Witnesses

The United States of America provides this Notice of Expert Witness pursuant to Rule 16 (a)(1)(G) of the Federal Rules of Criminal Procedure. This sets forth a summary of expected expert testimony and qualifications for each of the expert witnesses. As envisioned by the Rule, the government sets forth information designed to “minimize surprise that often results from unexpected testimony...and to provide the opponent with a fair opportunity to test the merit of the expert’s testimony through focused cross-examination.” *United States v. Smith*, 701 F.3d 1002 (4th Cir. 2012) (quoting Fed. R. Crim. P. 16(a)(1)(G) Advisory Comm. Note to the 1993 amendment). Should the Defendant need further clarification of the below summary or need additional information, the Government will provide such information upon request consistent with its obligations under Rule 16 and other relevant authorities.

1. Lindsey H. McGraw, II, Digital Forensics Examiner, Spartanburg County Sheriff’s Office

Mr. McGraw will testify as an expert the field of digital forensics, specifically as applied to the forensic examination of cell phones. He will testify as to the examination performed on Samsung/Galaxy S22 (SM-S901U) and Samsung/Galaxy A03 (SM-A037U) cellular phones that other testimony will show was seized from the Defendant. These items were imaged using Cellebrite UFED4PC and Cellebrite UFED PA. His opinion will be that the copy presented at trial was reliably made and is an accurate copy of the original provided to him and maintained in evidence.

He will also testify concerning the software used to download and preserve the above evidence, and extraction reports that have been available to defense counsel. He will testify that he used certain procedures to ensure the integrity of the evidence, and then produced copies of the materials in accordance with accepted industry standard procedures. He will also testify as to certain evidentiary items located on the device including, but not limited to, text messages, location information, internet searches performed during the relevant

timeframe, the lack of active cell service to the device, and other events reflected in the device's memory such as power on/power off events.

Mr. McGraw has extensive experience and training that qualify him as an expert in digital forensics. A copy of his CV is being provided herewith.

Respectfully submitted,

BRYAN P. STIRLING  
UNITED STATES ATTORNEY

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April 29, 2025

Pursuant to Federal Rule of Criminal Procedure 16(a)(1)(G)(v), I, Lindsey H. McGraw, have reviewed this disclosure and approve of its contents.

/s/Lindsey McGraw, II  
Lindsey H. McGraw, II  
Digital Forensics Examiner